

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF DELAWARE**

RICHARD R. CEPHAS,

Plaintiff,

V.

PHILADELPHIA MARINE TRADE  
ASSOCIATION,

and

INTERNATIONAL LONGSHOREMAN'S  
ASSOCIATION,

**Defendants.**

Civil Action No. 04-871-SLR

**DEFENDANT'S STATEMENT OF EFFORT TO REACH AN AGREEMENT  
PURSUANT TO LOCAL RULE OF CIVIL PRACTICE AND PROCEDURE 7.1.1**

Pursuant to Local Rule of Civil Practice and Procedure 7.1.1, Defendant

Philadelphia Marine Trade Association (“PMTA”) contacted Plaintiff Richard Cephas, who is appearing in this matter *pro se*, to confer regarding Defendant PMTA’s Motion to Join an Additional Defendant. Plaintiff was contacted on or about July 1, 2005 wherein the parties discussed the instant Motion in an effort to reach an agreement on Joining the Container Royalty Fund as an additional Defendant. At the conclusion of the discussion, Plaintiff informed Defendant that he would get back to Defendant after the holiday weekend. To date, Plaintiff has not contacted Defendant to discuss the instant Motion.

Defendant PMTA also attempted to contact counsel for Defendant International Longshoreman's Association ("ILA") pursuant to Local Rule of Civil Practice and Procedure 7.1.1 to reach an agreement on joining the Container Royalty Fund as an additional Defendant. Counsel for Defendant ILA has not responded to Defendant PMTA's efforts to discuss the instant Motion.

Respectfully Submitted,



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